

October 23, 2004

Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive #200  
Rancho Cordova, CA 95670-6114

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Dear Board of Directors:

We own and operate a small 120 cow family dairy on 150 acres of intense pasture grazing in the north valley. Five years ago, after attending three Environmental Stewardship short courses for California Dairy Operators, we learned what was necessary to certify our facility.

We weighed the cost of certifying versus selling our dairy, feeling that the fines could be more than the cows were worth. We decided the life style and raising our kids on the dairy would be worth the investment. After a year of hard work and spending \$40,000.00 (using our own earnings), our dairy became certified by a third party evaluator of the CDQAP. We felt good about the accomplishment and that we were not going to have to look over our shoulder in our lifetime, as we understood that nine government agencies had agreed on one set of regulations.

Not realizing it, we were one of the first 10 dairies to certify in the state. We were invited to a press conference in Sacramento in November of 2000 at the Capitol, we were honored as one of the first to certify in the Environmental Stewardship Module. (Enclosed is one of many press releases.)

After attending a meeting on October 20 with the Central Valley Regional Water Quality Control Board to review a draft general permit for milk cow dairies. We were shocked that in less than five years, we could be out of compliance and faced with another major expense in the near future. Especially, when the first \$40,000 is not paid in full.

We were encouraged by the presenters regardless of our herd size, to reply with comments in writing by November 5, 2004.

Having already certified with third party, we find that this application is repetitious in the following areas:

- A. No surface water discharge
- B. Backflow prevention
- C. No standing water in corrals
- D. Waste management plan
- E. Nutrient management plan

We would suggest that dairymen with a CDQAP certification should be able to use the certification in the place of the draft application you have developed. The weight of a dairyman that **VOLUNTEERED** for a third party evaluation should be heavier than a dairyman **FORCED** to comply.

We feel this represents all but one major issue – monitoring wells.

For a small dairyman to hire a consultant, drill 3 monitoring wells and have an analysis run, the costs could have a major impact. After some investigation, those types of services in our area are not available, thus adding an unknown cost to bring them two hours north of Sacramento.

We would like to see this eliminated because of the initial cost and yearly financial impact.

We want to be good stewards of the land and have clean water and this is why we chose to invest the \$40,000, five years ago. **Why** duplicate this program that is already in place?

Thank you for your time and consideration of the impact it could have on the dairymen of California.

Sincerely,

  
Mark and Brenda Alderson

Enclosure






# CALIFORNIA DAIRY REVIEW

Volume 5 Issue 1

Monthly

January 2001

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## Next Month...

*News and Information on Upcoming Hearings*

## CALIFORNIA DAIRY INDUSTRY SETS NATIONAL PRECEDENT...

### *California Dairy Farmers Recognized for Environmental Commitment*

The California dairy industry has racked up another "first." While the state's dairy cows lead the country in production, a group of California dairy families are the first ever to be certified for its best practices in environmental protection. The first dairies were honored for their achievements December 5, 2000.

"This is a proud moment for the California dairy industry," said Hilmar dairyman and chairman of the California Dairy Quality Assurance (CDQA) program Chuck Ahlem. "This voluntary program has provided us with the opportunity to bring our care for the environment to a higher level. With it, consumers can feel confident that we are continuing our goal to produce wholesome and nutritious dairy products in concert with a healthy environment."

The certifications come under CDQA's Environmental Stewardship program. This program brings together federal, state, and local agencies in partnership with dairy industry organizations to provide dairy farmers with a concise road map of standard procedures, systems, and equipment, assuring their farm is operating at the highest level for environmental safety.

- See **DAIRY FARMERS RECOGNIZED** on Page 5 -

Price Information Lines: (800) 503-3490 within California; (916) 442-MILK outside California

Retail Price Information Line: (888) 930-MILK; retail website: [www.cdffa.ca.gov/dairy/CMPS](http://www.cdffa.ca.gov/dairy/CMPS)

Phone: (916) 654-1456; Homepage Address: [www.cdffa.ca.gov/dairy](http://www.cdffa.ca.gov/dairy); e-mail Address: [dairy@cdffa.ca.gov](mailto:dairy@cdffa.ca.gov)



## DAIRY FARMERS RECOGNIZED

(Continued from page 1)

"Our industry has always been proactive in its environmental protection program," added Ahlem, "and we now have a formal system to recognize these efforts and generate further assurances." Ahlem noted that the program assists dairy farmers in making meaningful decisions about dairy management and interpreting the complex rules and regulations that govern their operations.

Alexis Strauss, director of the U.S. Environmental Protection Agency's water division in San Francisco, said the program's success to certify dairy producers is an unprecedented accomplishment for the nation's dairy industry.

"These dairies are investing time and effort to show that environmental stewardship and dairy production can indeed go hand in hand," Strauss said. "California's environment will continue to benefit as we get more and more dairies to complete this compliance program."

Dairy producers on hand to receive their certificates during a ceremony at the State Capitol were Alderson Dairy, Gerber; Bancroft Dairy Inc., Ferndale; Bartelink Dairy, Escalon; Bucher Dairy, Healdsburg; Charles Ahlem Ranch, Hilmar; and Walter Stornetta Ranch, Point Arena. They represented the first wave of dairies to gain certification status.

The CDQA Environmental Stewardship program has provided voluntary training to about 1,400 dairy farmers and their employees. Certified dairies attend six hours of course work developed by UC Davis, complete a comprehensive farm management plan, and pass a rigorous on-farm evaluation by the California Department of Food and Agriculture (CDFA).

The program began its initial evaluations in late summer. Following the non-regulatory evaluations by CDFA, these dairies voluntarily agreed to have follow-up inspections performed by the Regional Water Quality Board staff. Currently, on-farm evaluations are being funded by a substantial grant from the U.S. Environmental Protection Agency that will cover certification of up to 1,000 dairy facilities.

The CDQA Program was formed in 1997 to assist the state's dairy industry, in cooperation with state and federal agencies and the University of California, to improve best practices that affect all aspects of dairy operations. The program includes three components: Environmental Stewardship; Food Safety; and Animal Health and Welfare.

The CDQA is supported by dairy industry leadership including the Alliance of Western Milk Producers, California Farm Bureau Federation, California Manufacturing Milk Advisory Board, California Milk Advisory Board, Milk Producers Council, and Western United Dairymen. Government agencies and academic organizations partnering with the environmental certification program include the California Department of Food and Agriculture; the California Environmental Protection Agency; the State Water Resources Control Board; the California Resources Agency; the Department of Fish and Game; Region 9 of the U.S. Environmental Protection Agency; University of California at Davis; and the U.S. Department of Agriculture Animal Plant Health Inspection Service, Natural Resources Conservation Service, and Farm Services Agency.



## Producer News . . .

Next month, watch for a new section entitled "**Producer News.**" This new section will feature various "tidbits" of information from dairy producers across the state. The information will be gathered by the Dairy Marketing Branch Cost of Production staff. As staff visit dairies throughout the state each month to collect cost data for production cost reports, producers will be asked if they would like to share information on issues such as: what's new; what's been working/not working; improvements made that are making a difference; environmental issues, etc.- information they might want to share with other producers. Dairy producers may also send to the Department information appropriate to this section that they would like to share with other producers via this newsletter by fax (916) 654-0867 or by phone (916) 654-1456.